

1  
2 **IN THE UNITED STATES DISTRICT COURT**  
3 **FOR THE**  
4 **COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS**

5 **LISA S. BLACK,** ) **CIVIL ACTION NO. 05-0038**  
6 **Plaintiff,** )  
7 **vs.** )  
8 **JIM BREWER, individually and in his** ) **DECLARATION OF MICHAEL**  
9 **official capacity as Acting Principal for** ) **DOTTS**  
10 **Hopwood Junior High School,** )  
11 **COMMONWEALTH OF THE NORTHERN** )  
12 **MARIANA ISLANDS PUBLIC SCHOOL** )  
13 **SYSTEM, and JOHN AND/OR JANE DOE,** )  
14 **Defendants.** )

---

14 I, Michael W. Dotts, declare under the penalty of perjury according to the laws of the  
15 Commonwealth of the Northern Mariana Islands and the United States of America, that the  
16 following is true and based upon my personal knowledge, except where noted otherwise, and if  
17 called to testify, I could do so competently:  
18

19  
20 1. I am a partner with O'Conner, Berman, Dotts & Banes, the attorneys of record for the  
21 Plaintiff in the above-entitled action.  
22

23  
24 2. During the course of my representation of the Plaintiff, I conducted the Rule 30(b)(6)  
25 deposition of Defendant CNMI Public School System ("PSS"). During that deposition, PSS  
26 provided me with several exhibits that contained statistical information regarding classroom  
27 teacher employment status, relative levels of education and relative experience in teaching.  
28

**Exhibit "E"**

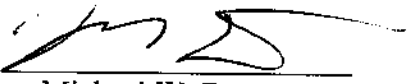
1  
2 3. Attached as "Exhibit A" to this declaration is a two page document that PSS  
3 represented reflected the employment status of PSS classroom teachers from the 1999/2000  
4 school year until the present. In the column "Separation-Not Renewed" the first chart shows  
5 that with the exception of one year in the past ten (10), PSS teachers stood a statistically  
6 insignificant chance of being non-renewed (reflected as a 0% nonrenewal rate). This chart  
7 reflected that in school year 2003/2004 there was a 1% incidence of separation by non-renewal.  
8 The second chart gives the actual numbers of teachers who were not renewed and reflects that  
9 only ten (10) teachers in the last ten (10) years have been separated by non-renewal of contract.  
10  
11

12 4. In representing my client I requested information with regard to the educational levels  
13 of the individuals who teach at PSS. I felt this is relevant because a reasonable jury could  
14 conclude that PSS would be inclined to renew the contracts of teachers who had themselves  
15 attained higher levels of education. Attached as "Exhibit B" to this declaration is a document  
16 that PSS represented reflects the current breakdown of educational levels of classroom teachers  
17 in PSS. It reflects that only 15% of the classroom teachers have Masters of Arts Degrees. Ms.  
18 Black has a Masters of Arts Degree in Curriculum and Teaching.  
19  
20  
21

22 5. In representing my client I requested information with regard to the teaching experience  
23 of the individuals who teach at PSS. I felt this is relevant because a reasonable jury could  
24 conclude that PSS would be inclined to renew the contracts of teachers who had themselves  
25 attained higher levels of teaching experience. Attached as "Exhibit C" to this declaration is a  
26 document that PSS represented reflects the current breakdown of teaching experience of  
27  
28


1 classroom teachers within PSS. It reflects that only eighteen (18) teachers in the entirety of  
2 PSS have between sixteen (16) and twenty (20) years of teaching experience and only four (4)  
3 have more than that. This is as compared to teachers with less than five years experience who  
4 total three-hundred and four (304). Ms. Black has approximately twenty (20) years of teaching  
5 experience.  
6

7  
8 Signed, on Saipan, Commonwealth of the Northern Mariana Islands, this 30<sup>th</sup> day of  
9 November, 2006.  
10

11  
12  
13   
14 Michael W. Dotts.  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

[illegible]

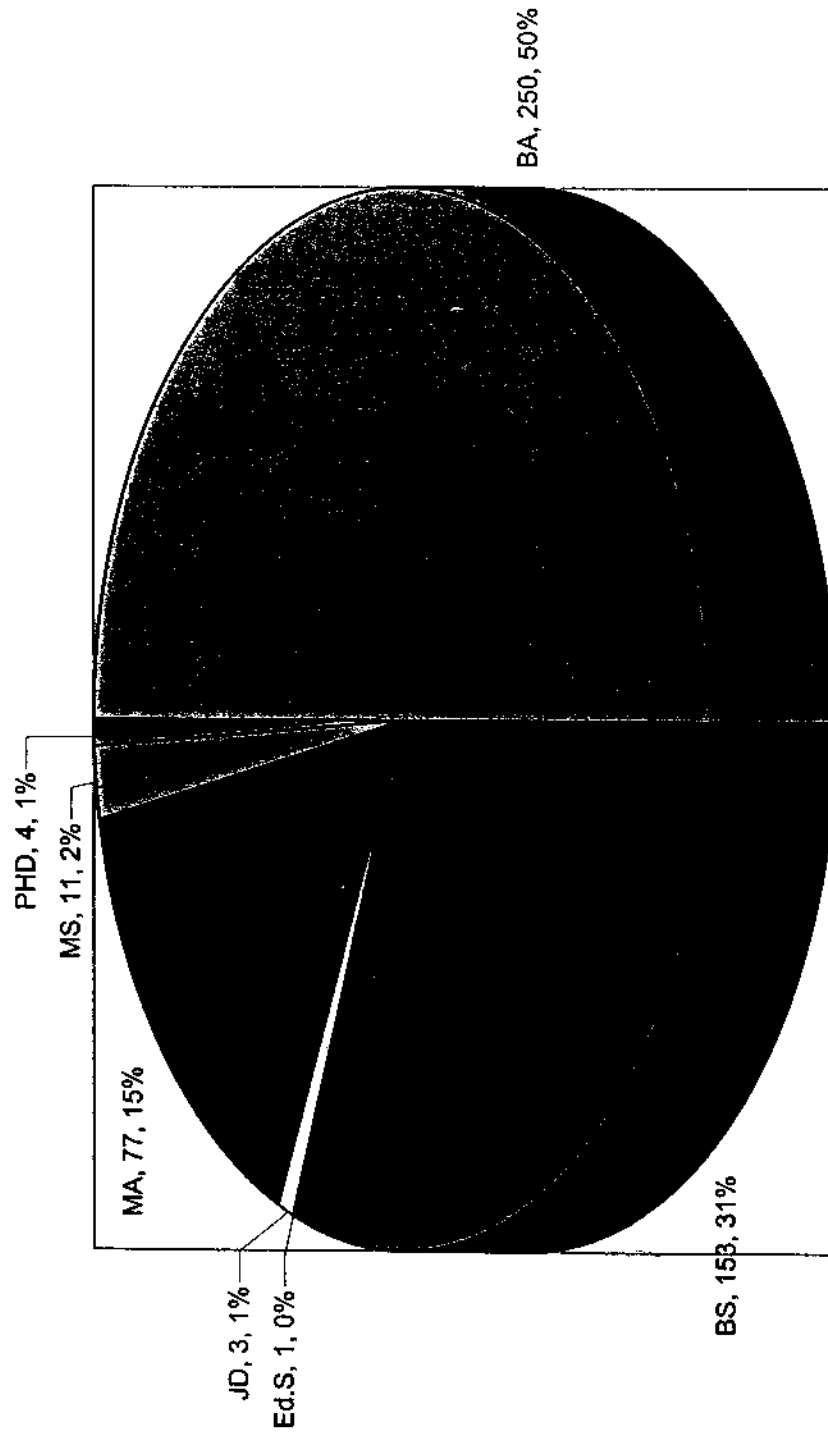
14



[illegible]

65

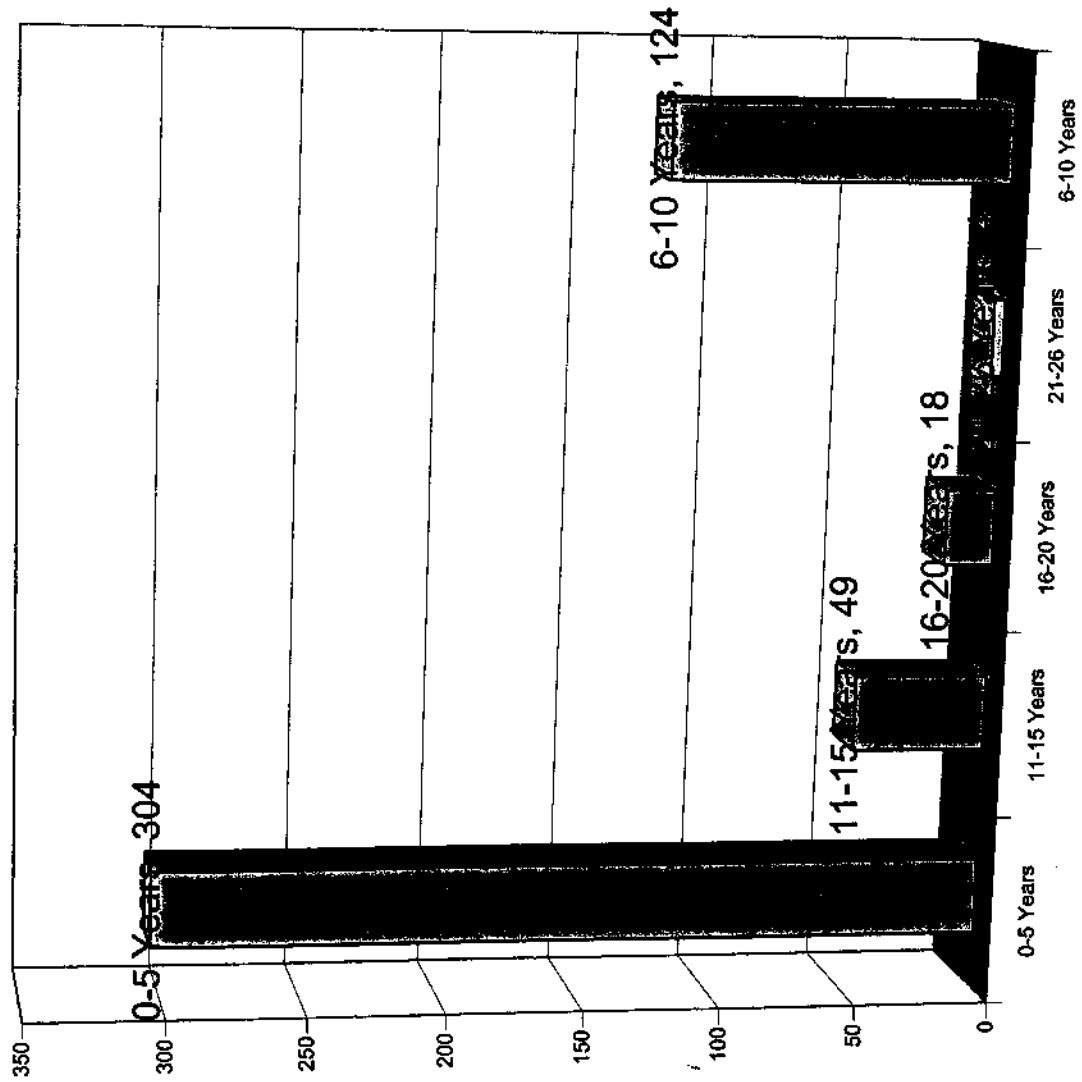
Current CT's Degree Count



☐ BA ☒ BS ☐ Ed.S ☐ JD ☒ MA ☐ MS ☐ PHD

(8)

Current CTs: Teaching Experience Count



D